

Eddie Paulsgrove

From: Loston, Anthony <Loston.Anthony@epa.gov>
Sent: Friday, March 6, 2020 6:52 AM
To: Eddie Paulsgrove
Subject: Re: radionuclides in POTW (Rio Rancho)

Good Morning Mr. Paulsgrove,

I have reviewed the email traffic. I am the enforcement officer assigned to the City of Rio Rancho. This facility is under enforcement review. I will be returning to the office on Wednesday, March 11th. If you have any additional information please send or call me directly.

Thanks,

Anthony M. Loston, Environmental Engineer
Arkansas State Enforcement Coordinator, EPA Region VI
EPA Region VI Vessel General Permit Enforcement Coordinator
Phone: (214) 665-3109
1201 Elm Street, Suite 500
Dallas, TX 75270-2102

Tony Loston

From: Eddie Paulsgrove <skysoldier3446@gmail.com>
Sent: Thursday, March 5, 2020 10:37 AM
To: Loston, Anthony <Loston.Anthony@epa.gov>
Cc: 'Eddie Paulsgrove' <skysoldier3446@gmail.com>
Subject: FW: radionuclides in POTW (Rio Rancho)

Mr. Loston, I understand you're the contact for the Rio Rancho, NM area re: the subject action. I imagine you've read the email chain below so know why I'm in contact. I'm putting together a submittal for both the EPA and the State AG in which I'm requesting an investigation into the disposal of radiological water into the City's POTW. I should have data to complete the submittal this week. If you have any questions please let me know.
I appreciate your time and consideration in this,

Eddie Paulsgrove

From: Tillman, Michael <Tillman.Michael@epa.gov>
Sent: Tuesday, February 25, 2020 9:33 AM
To: Eddie Paulsgrove <skysoldier3446@gmail.com>
Cc: Molina, Rudy <Molina.Rudy@epa.gov>; Nguyen, Tung <Nguyen.Tung@epa.gov>; Peters, Carol <Peters.Carol@epa.gov>; Loston, Anthony <Loston.Anthony@epa.gov>
Subject: RE: radionuclides in POTW (Rio Rancho)

Mr. Paulsgrove,

Thank you sir for your response. I certainly understand your interest and genuine concern you may have with the proper disposal of any contaminated waters. Mr. Tony Loston is the Enforcement Officer that works with the City of Rio Rancho. I have included him on this email so that he can get up to speed on your concerns. He can be reached at the email address included above or by phone at 214-665-3109. Tony is out in the field this week, but should be back in the office sometime next week.

***EPA Region 6 has moved, please note our new mailing address.**

Mike Tillman (ECD-WM)
Water Enforcement Branch
U.S. EPA Region 6
1201 Elm Street, Suite 500
Dallas, TX 75270-2102
phn. 214-665-7531, fax 214-665-2168
tillman.michael@epa.gov



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From: Eddie Paulsgrove <skysoldier3446@gmail.com>
Sent: Tuesday, February 25, 2020 10:11 AM
To: Tillman, Michael <Tillman.Michael@epa.gov>
Cc: Molina, Rudy <Molina.Rudy@epa.gov>; Nguyen, Tung <Nguyen.Tung@epa.gov>
Subject: RE: radionuclides in POTW

Mr. Tillman, I apologize if I appeared to be not forthcoming – I was only trying to make sure all my facts were accurate prior to providing them.
I'm just a citizen of Rio Rancho, I'm retired from USACE as a Senior Regulatory PM in the Albuquerque District. Mr. Tom Nystrom in your District likely still remembers me.
My purpose is to ensure contaminated briny water is disposed of in compliance with local, State & Federal regs – something that may not be happening at this point. I have no other agenda.

I've been in contact with the City & NMED re: this issue & do not feel as though the knowing and willful disposal has been addressed.

I agree that the passthrough of Gross Alpha, Arsenic & Total Radium may very well violate established State WQ Standards. One concern is the briny water's highly contaminated nature and the apparent casual nature the water is handled.

I'm hoping to meet w/USFWS today because I believe there is designated Critical Habitat at or immediately downstream of the effluent discharge point on the Rio Grande & the introduction of the passthrough pollutants, while not an excessive quantity (6,000 gallons), should still be a major concern.

Sir, as a regulator, I had a problem with knowing and willful violators who look for forgiveness because they couldn't get permission – I guess I still do!

It's that simple, I'm just a citizen looking to ensure compliance with environmental regs. I hope to have data as accurate as possible in a day or two.

I appreciate your effort in this & please contact me if there're any additional concerns re: me.

Eddie Paulsgrove

From: Tillman, Michael <Tillman.Michael@epa.gov>

Sent: Tuesday, February 25, 2020 8:50 AM

To: Eddie Paulsgrove <skysoldier3446@gmail.com>

Cc: Molina, Rudy <Molina.Rudy@epa.gov>; Nguyen, Tung <Nguyen.Tung@epa.gov>

Subject: RE: radionuclides in POTW

Good morning Mr. Paulsgrove,

I have been keeping up with the discussions between you and Mr. Molina, the Region 6 Pretreatment Coordinator. I can only agree with Mr. Molina's previous responses. The City of Rio Rancho has ultimate authority as to what they receive into their collection system.

The City's ordinance specifically prohibits the discharge of any radioactive wastes or isotopes into their collection system without approval from their Director. EPA does not regulate radioactive wastes, the Nuclear Regulatory Commission does. EPA does however regulate what impacts the treatment process of a municipal wastewater plant (WWTP). Previous studies (see attached) have shown that radioactive wastes can interfere with the WWTP's ability to dispose of its sludge / biosolids as radioactive materials can end up in the treatment plants sludge. This causes problems with the disposal of the sludge which can cause the municipality additional costs and regulatory burden. Any passthrough of radionuclides can cause an issue with the State of New Mexico and compliance with State Water Quality Standards.

Ultimately without explicit approval from the City of Rio Rancho, you will not be allowed to discharge any nuclear wastes, isotopes or radionuclides into the City's collection system.

Since you seem to be a little less than forthcoming with specific information, I would like to request additional information on your part. Who are you? Who are you working with or for? What is the purpose for your inquiry?

***EPA Region 6 has moved, please note our new mailing address.**

Mike Tillman (ECD-WM)
Water Enforcement Branch
U.S. EPA Region 6
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From: Eddie Paulsgrove <skysoldier3446@gmail.com>
Sent: Tuesday, February 25, 2020 8:36 AM
To: Tillman, Michael <Tillman.Michael@epa.gov>
Subject: radionuclides in POTW

Mr. Tillman;

I see that you've been copied on a little of this issue but I hope to communicate to you the problems I have with disposal of radionuclides into my City's POTW soon. I'm developing a more complete submittal that I hope will address most questions.

I appreciate your time and consideration in this issue,

Eddie Paulsgrove